

**Olin CHEMICALS**

P.O. BOX 248, LOWER RIVER ROAD, CHARLESTON, TN 37310

PHONE: (615) 336-4000

October 28, 1991

VIA FEDERAL EXPRESS

Kenneth A. Lucas  
Senior Remedial Project Manager  
United States Environmental Protection Agency  
345 Courtland Street Northeast  
Atlanta, Georgia 30365

Re: Revised Schedule  
Olin Chemicals/McIntosh Plant Site  
McIntosh, Alabama

Dear Mr. Lucas:

In accordance with several conversations that we have had over the past week, a revised schedule is attached for your review and approval. I am sending a copy of this cover letter with one of the four copies attached for Joanne Benante. The attached schedule is a revision to the May 24, 1991, version that was submitted to EPA with the Work Plan. The major revision is the actual date of Work Plan approval by EPA. The 5/24/91 version anticipated approval by June 26, 1991; approval actually occurred July 17, 1991. Other than changes as a result of the actual Work Plan approval date, no other major deliverable date, including the final RI/FS report, has changed.

We discussed the Source Evaluation Technical Memorandum and the change in it's submission date to November 11 from September 22. When the schedule for this report was first planned, we thought the groundwater database developed for Olin could be effectively used to allow us to meet the September date. As we reviewed this database developed from almost 10 years of RCRA monitoring, we found that the number of errors and the extensive amount of data required more time than anticipated to assure the quality of the database. The additional time to assure the quality caused the change to November 11. Woodward-Clyde was able to manage other tasks within the schedule so that the major deliverables dependent on the Source Evaluation Technical Memorandum maintained their submission dates.

As I explained, discussions with EPA during the Order and Work Plan negotiations had indicated that Olin could produce a detailed schedule to be used both as a working document and as the documentation of submission dates for major deliverables, including the final RI/FS report. We believed that having the details would be beneficial to both Olin and EPA in communicating upcoming plans. There was never any discussion that the details within the overall schedule that did not affect major deliverables' submission dates would be subject to alleged violations of the Order.

20151

3.4

3 4 0094

SOUTH  
OCT 29 2 29 PM '91  
BRANCH

TND1018  
W & R D  
MEMPHI  
L. UNORGA

TND1018  
W & R D  
MEMPHI  
L. UNORGA

This was the basis for the Monthly Report schedule that Olin proposed and EPA accepted.

Regarding the Equivalency Demonstration required under Section 5.3.2.5 of the Work Plan, Olin will send the previous Appendix VIII groundwater data and a map showing the relationship of the wells from which these data were generated to the Solid Waste Management Units (SWMUs) on October 31, 1991. We will address these to Joanne Benante. This will allow us to proceed with the program outlined on page 77 of the Work Plan. We anticipate that the submission of the specific activities to be conducted for the equivalency demonstration (i. e., a description of any sampling activity, parameters to be analyzed, etc.) would occur in January 1992.

Please let me know if you have any questions regarding this submission or any of the work in progress at McIntosh, Alabama.

Sincerely,

TND101811099  
W & R DRUMS SITE  
MEMPHIS, SHELBY TN  
UNORGANIZED SITE FILE

OLIN CORPORATION  
TND101811099  
W & R DRUMS SITE  
MEMPHIS, SHELBY TN  
UNORGANIZED SITE FILE

TND101811099  
W & R DRUMS SITE  
MEMPHIS, SHELBY TN  
UNORGANIZED SITE FILE

\jcb  
Enclosure

TND101811099  
W & R DRUMS SITE  
MEMPHIS, SHELBY TN  
UNORGANIZED SITE FILE

J. C. Brown  
Manager, Environmental Technology  
TND101811099  
W & R DRUMS SITE  
MEMPHIS, SHELBY TN  
UNORGANIZED SITE FILE

TND101811099  
W & R DRUMS SITE  
MEMPHIS, SHELBY TN  
UNORGANIZED SITE FILE

cc: W. A. Beal (w/o enc.)  
Joanne Benante  
D. E. Cooper (2)  
W. J. Derocher (w/o enc.)  
M. L. Fries (w/o enc.)

W. G. McGlasson (w/o enc.)  
J. L. McIntosh (w/o enc.)  
T. B. Odom  
R. A. Pettigrew